

# Exhibit A

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*Attorney for Plaintiff*

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

BRENDAN E. ADAMS, an individual,

CV 18-148-M-DLC

Plaintiff and Counter  
Defendant,

-VS-

HOWARD C. ROBERTS, an individual

Defendant and Counter  
Claimant.

DECLARATION OF  
BRENDAN E. ADAMS

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I, Brendan E. Adams, hereby certify under penalty of perjury under the laws  
of the United States of America that the following is true and correct:

1. I am the Plaintiff and Counter Defendant in the above-captioned matter.
2. I am competent to handle my financial affairs and have personal first-hand knowledge of the nature, scope, and value of my assets and liabilities.
3. Based on my knowledge of my financial condition, I prepared the Personal Financial Statement attached as Exhibit 1. That Personal Financial Statement provides an up-to-date and accurate summary of my total assets, total liabilities, and net worth.
4. Prior to 2010 I worked as an insurance broker and owned a 50% interest in an insurance and financial services company called Central Financial Services. In 2010 I sold my interest in that company as part of a forced disability retirement. I am not “retired” in the traditional sense of the word, but due to a medical condition I no longer work in the insurance and financial services field. My remaining proceeds from the sale of my interest in Central Financial Services make up nearly all of the \$382,419 of listed stocks, bonds, & mutual funds shown on line 4 of Exhibit 1.
5. I do not own a ranch, nor have I recently purchased a ranch. The property on which my son, Johnathan Adams, works is a 38.5 acre parcel of property that is owned by Turtle Point Properties, LLC (“TPP”). I own a 25% interest in TPP.

6. Earlier in 2021, TPP purchased the 38.5 acre property for approximately \$400,000. The property is currently encumbered by a note for all or nearly all of its purchase price.

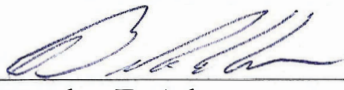
7. The 38.5 acre parcel is not currently, and has not recently been operated as a ranch. Ideally, someday, the property could become economically productive but it is not now (nor has it been recently) operated as a going business concern.

8. The \$91,250 figure on line 13 of Exhibit 1 represents my share of TPP's cash on hand and the value of personal property held by the LLC, such as vehicles and equipment.

9. The homestead on which I currently live with my wife and family is a single taxable lot at Lake Mary Ronan with the address 52441 Lake Mary Ronan Rd. That property is the only property in which I have an interest at Lake Mary Ronan. Although some records display the 52441 property as comprised of two parcels, for all relevant purposes the property is treated as a singular piece of real property. The 52441 property is taxed as a singular lot; it only has one tax identification number; there is only one county assessment value (not two); and many relevant county records regard and display the 52441 property as a singular lot, and not as two separate parcels of property. I own the 52441 property with my wife. The value of my interest in the property is approximately \$300,000.

10. As shown on Exhibit 1, my net worth as of the date of this declaration is approximately \$412,665.

DATED this 4<sup>th</sup> day of June, 2021.

  
Brendan E. Adams

# Exhibit 1

**PERSONAL FINANCIAL STATEMENT**NAME: Brendan E Adams PFS AS OF: June 1, 2021

1.	Cash on Hand	\$ 500
2.	Cash in Bank	20,000
3.	Notes & Contracts Receivable	-0-
4.	Stocks, Bonds & Mutual Funds - Listed	382,419
5.	Stocks & Bonds - Unlisted	-0-
6.	Real Estate & Buildings	300,000
7.	Machinery & Equipment	-0-
8.	Furniture, Fixtures & Personal Property	10,000
9.	Auto & Trucks	20,000
10.	Cash Value of Life Insurance	19,999
11.	IRA Funds	426,845
12.	Qualified Retirement Plans	-0-

**OTHER ASSETS (Describe)**

13.	<u>Turtle Point Properties, LLC</u>	91,250
14.	<u>Boats and ATV's</u>	15,900
15.	<u></u>	

**TOTAL ASSETS**

1,286,913

**TOTAL LIABILITIES**

874,248

**NET WORTH**

\$ 412,665

**TOTAL LIABILITIES**

16. Credit Cards & Installation Purchases  
 17. Notes & Contracts Payable  
 18. Mortgages & Contracts on Real Estate  
 19. Auto & Truck Loans

\$	20,000
	4,248
	-0-
	-0-

**OTHER LIABILITIES (Describe)**

20. Judgment  
 21. \_\_\_\_\_

850,000

**TOTAL LIABILITIES**

**NET WORTH**

874,248
\$ 412,665